

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:22-CV-00422-JRG-RSP

JOINT STIPULATION REGARDING CASE NARROWING

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, “Samsung”) file this Joint Notice Regarding Case Narrowing and stipulate as follows:

1. Headwater withdraws its Doctrine of Equivalents and Indirect Infringement allegations asserted against Samsung in Headwater’s Second Amended Complaint for Patent Infringement (Dkt. No. 42).
2. Samsung withdraws its Third Affirmative Defense (Laches, Equitable Estoppel, Waiver, and/or Unclean Hands); Fourth Affirmative Defense (Prosecution History Estoppel and/or Disclaimer); Sixth Affirmative Defense (Covenant Not to Sue, License, and/or Estoppel); and Seventh Affirmative Defense (Failure to State a Claim) asserted in Samsung’s Amended Answer and Defenses to Plaintiff Headwater Research LLC’s Second Amended Complaint for Patent Infringement (Dkt. No. 81).

Dated: May 14, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on May 14, 2024. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Thad C. Kodish

Thad C. Kodish